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Credit Card Remitted			\$5.00
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1430 Marvin Griffin Road  
Augusta, GA 30906

## KPR U.S., LLC

Tel: 706-793-3030  
Fax: 706-771-2230

January 26, 2021

Mr. Sean Taylor  
Georgia Air Protection Branch  
Stationary Source Compliance Program  
4244 International Parkway, Suite 120  
Atlanta, Georgia 30354

Re: **KPR U.S., LLC**  
**d/b/a Kendal Patient Recovery**  
**Air Quality Permit 3842-245-0109-S-05-0**

Mr. Taylor:

KPR U.S., LLC (d/b/a Kendal Patient Recovery) owns and operates a wound care manufacturing and sterilization facility located at 1430 Marvin Griffin Road, Augusta, Georgia 30906 (Richmond County). Air emissions are currently authorized by Air Quality Permit 3842-245-0109-S-05-0 which requires the following reports for each semiannual period:

- 40 Code of Federal Regulations (CFR) Part 63, Subpart O Ethylene Oxide Emissions Standards for Sterilization Facilities deviation and continuous monitoring system (CMS) performance reports per Condition 7.9;
- Air Quality Permit 3842-245-0109-S-05-0 excess emission, exceedance, and/or excursion report per Condition 7.10; and
- 40 CFR Part 63, Subpart Dc Standards of Performance for Small Steam Generating Units distillate fuel oil purchases and firing report per Condition 7.11.

Please find attached hereto all three semiannual monitoring reports for the reporting period between **July 1 and December 31, 2020**. If you have any comments or questions about the information presented herein, please call or email me at (706) 771-2170 ([jay.johnson02@cardinalhealth.com](mailto:jay.johnson02@cardinalhealth.com)).

KPR U.S., LLC



Mr. Jay Johnson  
EHS Manager

1430 Marvin Griffin Road  
Augusta, GA 30906

## KPR U.S., LLC

Tel: 706-793-3030  
Fax: 706-771-2230

January 26, 2021

To: [Air.Releases@dnr.ga.gov](mailto:Air.Releases@dnr.ga.gov)

CC: Mr. Sean Taylor

Georgia Air Protection Branch

Stationary Source Compliance Program

4244 International Parkway, Suite 120

Atlanta, Georgia 30354

Re: KPR U.S., LLC  
d/b/a Kendal Patient Recovery  
Air Quality Permit 3842-245-0109-S-05-0  
Condition 7.9 – Semiannual NESHAP Report

Mr. Taylor:

KPR U.S., LLC (d/b/a Kendal Patient Recovery) owns and operates a wound care manufacturing and sterilization facility located at 1430 Marvin Griffin Road, Augusta, Georgia 30906 (Richmond County). Air emissions are currently authorized by Air Quality Permit 3842-245-0109-S-05-0 most recently issued September 27, 2017. Condition 7.9 requires deviation and continuous monitoring system (CMS) performance reports per 40 Code of Federal Regulations (CFR) Part 63, Subpart O Ethylene Oxide Emissions Standards for Sterilization Facilities for each semiannual period ending June 30 and December 31. Please find attached hereto the semiannual monitoring report for the reporting period between **July 1, 2020 and December 31, 2020**.

***Condition 7.9 – In accordance with 40 CFR 63.10, 63.366(a), and Table 1 of 40 CFR 63 Subpart O, the Permittee shall submit the following reports:***

- a. Deviation reports; and***
- b. Continuous Monitoring System performance and summary reports.***

***Content and submittal dates for Deviation and Continuous Monitoring System Performance Reports shall be as specified in 40 CFR 63.366(a)(3).***



40 CFR 63.366(a)(3) goes on to provide:

*Written reports of deviations from an operating limit shall include all information required in 40 CFR 63.10(c)(5) through (13), as applicable in Table 1 of § 63.360, and information from any method used for temperature calibration. The written report shall also include the name, title, and signature of the responsible official who is certifying the accuracy of the report. When no deviations have occurred, or monitoring equipment has not been inoperative, repaired, or adjusted, such information shall be stated in the report.*

The required certification is provided at the conclusion of this correspondence. Finally, 40 CFR 63.10(c)(5) through (c)(13) provides:

**40 CFR 63.10(c)(5) – The date and time identifying each period during which the CMS was inoperative except for zero (low-level) and high-level checks.**

Date	Times & Explanation
7/25/2020 - 07/27/2020	At approximately 0810hrs an electrical power outage occurred at the facility. This occurred on the weekend while no production was running. System interlocks engaged and no venting to the Peak Shaver and Catalytic Oxidizer occurred. Systems were restored at 0200hrs on July 27th and processes continued.
8/5/2020	At approximately 1800hrs an electrical power outage occurred at the facility. System interlocks engaged and placed all processes on hold and no venting to the Peak Shaver and Catalytic Oxidizer occurred. Systems were restored at 2130hrs and processes continued.
8/21/2020	At approximately 0830hrs an electrical power blip occurred at the facility. System interlocks engaged and placed all processes on hold and no venting to the Peak Shaver and Catalytic Oxidizer occurred. Systems were restored at 0910hrs and processes continued.
8/29/2020 - 08/31/2020	At approximately 0650hrs an electrical power outage occurred at the facility. This occurred on the weekend while no production was running. System interlocks engaged and no venting to the Peak Shaver and Catalytic Oxidizer occurred. Systems were restored at 0100hrs on August 31st and processes continued.
9/1/2020	At approximately 0850hrs an electrical power blip occurred at the facility. System interlocks engaged and placed all processes on hold and no venting to the Peak Shaver and Catalytic Oxidizer occurred. Systems were restored at 0900rs and processes continued.

9/14/2020	At approximately 1400hrs an electrical power outage occurred at the facility. System interlocks engaged and placed all processes on hold and no venting to the Peak Shaver and Catalytic Oxidizer occurred. Systems were restored at 1415hrs and processes continued.
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**40 CFR 63.10(c)(6) – The date and time identifying each period during which the CMS was out of control.**

At no time during the reporting period were the Catalytic Oxidizer (CO) temperature CMS out of control.

**40 CFR 63.10(c)(7) – The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions and parameter monitoring exceedances, as defined in the relevant standard(s), that occurs during startups, shutdowns, and malfunctions of the affected source.**

Date	Malfunctions & Preventative Maintenance (PM) Explanation
7/17/2020 - 07/20/2020	At approximately 1500hrs on July 17th until 1130hr on July 20th the systems were shut down and semiannual Preventive maintenance occurred.
8/27/2020	At 0815hrs quarterly Preventive maintenance was done on the system. The systems were back online at approximately 0900hrs.
11/7/2020	At 1330hrs quarterly preventive active maintenance was done on the system. The systems were back online at approximately 01350hrs.
11/30/2020	At 0630hrs quarterly and semi-annual PM's occurred. The PM's were completed at 0930hrs and the system was restored. No production occurred during this time.
11/30/2020	Between 1600hrs there was a disruption of natural gas and the plant swapped over to propane which caused the low fuel pressure sensor to shut down the system. Interlock isolated the system and no venting occurred. No permit deviations occurred during this time.

12/23/2020 - 12/30/2020	Between 0750hrs on 12/23/2020 until 0900hrs on 12/30/2020 the system was shut down for semiannual preventative maintenance and a site wide power outage. No permit deviations occurred during this time.
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**40 CFR 63.10(c)(8) – The specific identification (i.e., the date and time of commencement and completion) of each time period of excess emissions and parameter monitoring exceedances, as defined in the relevant standard(s), that occurs during periods other than startups, shutdowns, and malfunctions of the affected source.**

**40 CFR 63.10(c)(9) – Reserved.**

**40 CFR 63.10(c)(10) – The nature and cause of any malfunctions (if known).**

At no time during the reporting period were there any CO temperature CMS malfunctions.

**40 CFR 63.10(c)(11) – The corrective action taken, or preventive measures adopted.**

At no time during the reporting period were there any CO temperature CMS malfunctions necessitating the need for any corrective actions or preventative measures.

**40 CFR 63.10(c)(12) – The nature of the repairs or adjustments to the CMS that was inoperative or out of control.**

At no time during the reporting period were the CO temperature CMS inoperative or out of control.

**40 CFR 63.10(c)(13) – The total process operating time during the reporting period.**

Total process operating time during each reporting period was 4,220 hours.

\* \* \* \* \*



If you have any comments or questions about the information presented herein, please call or email me at (706) 793-0311 ([jay.johnson02@cardinalhealth.com](mailto:jay.johnson02@cardinalhealth.com)).

KPR U.S., LLC

  
Mr. Jay Johnson  
EHS Manager

***Certification by a Responsible Official***

***I, Ruben Rosa-Rivera, based on information and belief formed after reasonable inquiry, certify that the statements and information in this report are true, accurate, and complete.***

  
\_\_\_\_\_  
Ruben Rosa-Rivera, Site Director

January 26, 2021  
Date

## KPR U.S., LLC

Tel: 706-793-3030  
Fax: 706-771-2230

January 26<sup>th</sup>, 2021

Mr. Sean Taylor  
Georgia Air Protection Branch  
Stationary Source Compliance Program  
4244 International Parkway, Suite 120  
Atlanta, Georgia 30354

Re: KPR U.S., LLC  
d/b/a Kendal Patient Recovery  
Air Quality Permit 3842-245-0109-S-05-0  
Condition 7.10 – Semiannual Monitoring Report

Mr. Taylor:

KPR U.S., LLC (d/b/a Kendal Patient Recovery) owns and operates a wound care manufacturing and sterilization facility located at 1430 Marvin Griffin Road, Augusta, Georgia 30906 (Richmond County). Air emissions are currently authorized by Air Quality Permit 3842-245-0109-S-05-0 most recently issued September 27, 2017. Condition 7.10 requires a written report detailing excess emissions, exceedances, and/or excursions in addition to any monitor malfunctions for each semiannual period ending June 30 and December 31. Please find attached hereto the semiannual monitoring report for the reporting period between **July 1 and December 31, 2020**.

***Condition 7.10.a – A summary report of excess emissions, exceedances and excursions, and monitor downtime including any failure to follow required work practice procedures.***

There were no excess emissions, exceedances, excursions, monitor downtime, or failure to follow required work practice procedures during the reporting period.

***Condition 7.10.b – Total plant process operating time during each reporting period.***

Total plant process operating time during each reporting period was 4320 hours.

***Condition 7.10.c – The magnitude of all excess emissions, exceedances and excursions computed in accordance with the applicable definitions as determined by the Director, and any conversion factors used, and the date and time of the commencement and completion of each time period of occurrence.***

There were no excess emissions, exceedances, or excursions during the reporting period.



**Condition 7.10.d – Specific identification of each period of such excess emissions, exceedances, and excursions that occur during startups, shutdowns, or malfunctions of the affected facility. Include the nature and cause of any malfunction (if known), the corrective action taken or preventive measures adopted.**

There were no excess emissions, exceedances, or excursions during the reporting period.

**Condition 7.10.e – The date and time identifying each period during which any required monitoring system or device was inoperative (including periods of malfunction) except for zero and span checks, and the nature of the repairs, adjustments, or replacement. When the monitoring system or device has not been inoperative, repaired, or adjusted, such information shall be stated in the report.**

At no time during the reporting period was any required monitoring system or device inoperative.

**Condition 7.10.f – Certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.**

The required certification is provided at the conclusion of this correspondence.

If you have any comments or questions about the information presented herein, please call or email Mr. Jay Johnson at (706) 771-02170 ([jay.johnson02@cardinalhealth.com](mailto:jay.johnson02@cardinalhealth.com)).

KPR U.S., LLC

Mr. Jay Johnson  
EHS Manager

**Certification by a Responsible Official**

***I, Ruben Rosa-Rivera, based on information and belief formed after reasonable inquiry, certify that the statements and information in this report are true, accurate, and complete.***

  
Ruben Rosa-Rivera, Site Director

January 26, 2021  
Date

## KPR U.S., LLC

Tel: 706-793-3030  
Fax: 706-771-2230

January 26th, 2021

Mr. Sean Taylor  
Georgia Air Protection Branch  
Stationary Source Compliance Program  
4244 International Parkway, Suite 120  
Atlanta, Georgia 30354

Re: KPR U.S., LLC  
d/b/a Kendal Patient Recovery  
Air Quality Permit 3842-245-0109-S-05-0  
Condition 7.11 – Semiannual Subpart Dc Report

Mr. Taylor:

KPR U.S., LLC (d/b/a Kendal Patient Recovery) owns and operates a wound care manufacturing and sterilization facility located at 1430 Marvin Griffin Road, Augusta, Georgia 30906 (Richmond County). Air emissions are currently authorized by Air Quality Permit 3842-245-0109-S-05-0 most recently issued September 27, 2017. Condition 7.11 requires a written report detailing distillate fuel oil purchases and firing for each semiannual period ending June 30 and December 31. Please find attached hereto the semiannual monitoring report for the reporting period between **July 1 and December 31, 2020**.

***Condition 7.11 – The Permittee shall submit to the Division a semiannual report, within 30 days following the end of each such period ending June 30 and December 31, regarding distillate fuel oil purchases and the firing of such oil in any boiler. The report shall contain:***

- a. The name of each fuel oil supplier and a statement from each supplier certifying that the fuel oil complies with Condition 2.8.***

There were no deliveries during the reporting period.

- b. A certified statement signed by the Permittee that the records of fuel oil supplier certifications submitted in accordance with paragraph (a) of this condition represent all of the fuel oil fired in the boilers during the reporting period.***

The required certification is provided at the conclusion of this correspondence.

- c. *The 12-month rolling total, in gallons, of the amount of fuel oil burned at the facility for each month in the reporting period. If no fuel oil was fired in a boiler during the reporting period, the report shall so state.*

Please see Attachment A for the 12-month rolling total (in gallons) of fuel oil burned at the facility for each month during the reporting period.

If you have any comments or questions about the information presented herein, please call or email Mr. Jay Johnson at (706) 771-2170 ([jay.johnson02@cardinalhealth.com](mailto:jay.johnson02@cardinalhealth.com)).

KPR U.S., LLC

Mr. Jay Johnson  
EHS Manager



Attachment A – Rolling 12-month Fuel Oil Consumption

***Certification by a Responsible Official***

*I, Ruben Rosa-Rivera, based on information and belief formed after reasonable inquiry, certify that the records of fuel oil supplier certifications submitted in accordance with paragraph (a) of this condition represent all of the fuel oil fired in the boilers during the reporting period.*

  
Ruben Rosa-Rivera, Site Director

January 26, 2021  
Date



Attachment A: Rolling 12-month Fuel Oil Consumption

Month	Year	12 Month Rolling Total Fuel Oil Consumption Gallons
July	2020	2145
August	2020	2145
September	2020	2145
October	2020	2145
November	2020	546
December	2020	749